

HARDIN, KUNDLA, McKEON & POLETTO

COUNSELLORS AT LAW
A PROFESSIONAL CORPORATION

673 MORRIS AVENUE
SPRINGFIELD, NEW JERSEY 07081

(973) 912-5222

FAX (973) 912-9212

www.HKMPP.com

Paul Daly
Direct Dial: (973) 315-2244
pdaly@hkmpp.com

CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL ATTORNEY

NEW YORK OFFICE
110 William Street
New York, New York 10038
(212) 571-0111
FAX (212) 571-1117

PENNSYLVANIA OFFICE
60 West Broad Street
Suite 102
Bethlehem, Pennsylvania 18018
(610) 433-8400
FAX (610) 433-0300

April 26, 2022

Magistrate Judge Jessica S. Allen
USDC, District of New Jersey (Trenton)
Clarkson S. Fisher Federal Bldg & U
Trenton, NJ 08608

RE: Failla v. George's Foods, LLC, et al.
Docket No. 3:20-cv-07109-BRM-TJB
File No. 666.47134

Dear Judge Donio:

Pursuant to the court's direction, please accept this as a joint report of the parties as to the status of this matter.

The parties have exchanged expert reports. In addition, we have completed the depositions of plaintiff's liability experts.

We have scheduled the deposition of one of the defense liability experts for June 21, 2022 and are in the process of scheduling the other.

Please do not hesitate to let us know if there any additional questions or concerns.

Page 2
April 26, 2022

Respectfully,

Paul Daly

PD:ld

cc: David T. Sirotkin, Esq.
Benedict P. Morelli, Esq.
Alexander Morelli, Esq.
Morelli Law Firm, PLLC